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**west virginia** department of environmental protection

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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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## **ENGINEERING EVALUATION / FACT SHEET**

### **BACKGROUND INFORMATION**

Application No.:	R13-2889
Plant ID No.:	011-00204
Applicant:	CSX Transportation, Inc.
Facility Name:	Division Office Building Huntington
Location:	Huntington, Cabell County
NAICS Code:	551114
Application Type:	Construction
Received Date:	June 16, 2011
Engineer Assigned:	Roy F. Kees, P.E.
Fee Amount:	\$2,000.00
Date Received:	July 20, 2011
Complete Date:	July 20, 2011
Due Date:	October 20, 2011
Applicant Ad Date:	June 10, 2011
Newspaper:	<i>The Herald Dispatch</i>
UTM's:	Easting: 374.113 km    Northing: 4253.055 km    Zone: 17
Description:	Application for the construction of two emergency generators to be located at an office building.

### **DESCRIPTION OF PROCESS**

From Permit Application R13-2889:

CSX Transportation, Inc. (CSXT), currently owns and operates a Division Office Building located at 935 7th Avenue in Huntington, WV. Currently this office does not operate under any air quality permits. During a recent internal compliance review, it was determined that two emergency generators, which were installed in August 2008 were not permitted. After a review of the exemption criteria and discussions with WVDEP permitting engineers, it was determined that these two emergency generators would be required to be permitted. Therefore, CSXT is submitting this after-the-fact application for a NSR permit.

These two generators are subject to and are certified to meet all applicable requirements of 40CFR60 Subpart IIII. The generators are expected to operate no more than 500 hours

per year, including necessary testing and maintenance, and use ultra low sulfur diesel fuel.

### SITE INSPECTION

A site inspection was deemed unnecessary by the writer at this time. However, the source will be added to the list of future inspections.

*The site is located at 935 7th Avenue in Huntington, WV.*

### ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

The hourly emission rates were calculated using manufacturer data for the particular engine being used. This engine is EPA certified and meets the allowable limits of Subpart IIII.

Emission Unit	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)*
EG-1 Caterpillar C15 ACERT	Nitrogen Oxides	6.78	1.70
	Carbon Monoxide	3.71	0.93
	Volatile Organic Compounds	0.45	0.11
	Sulfur Dioxide	0.01	0.01
	Particulate Matter-10	0.11	0.03
EG-2 Caterpillar C15 ACERT	Nitrogen Oxides	6.78	1.70
	Carbon Monoxide	3.71	0.93
	Volatile Organic Compounds	0.45	0.11
	Sulfur Dioxide	0.01	0.01
	Particulate Matter-10	0.11	0.03

\* - Annual Emission Rate is based on operating 500 hours at max load.

## REGULATORY APPLICABILITY

*45CSR13 - Permits for Construction, Modification, Relocation and Operation of Stationary sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation*

CSX is subject to 45CSR§13-5.1., which states “no person shall cause, suffer, allow permit the construction, modification, or location of any stationary source to be commenced without notifying the Secretary of such intent and obtaining a permit to construct, modify, or relocate the stationary source as required in this rule or any stationary as required in this rule or any other applicable rule promulgated by the Secretary.” This source is a stationary source because it is subject to a substantive rule (Subpart IIII) as per 45CSR§13-2.24.a. CSX has complied with the public review procedures in 45CSR§13-8.3. by publishing a legal ad in *The Herald Dispatch* on June 10, 2011.

*45CSR16 - Standards of Performance for New Stationary Sources*

*40 CFR 60 Subpart IIII- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

According to §40CFR60.4200(2)(i), CSX's engines are subject to Subpart IIII because is was built after April 1, 2006 and is not a fire pump engine.

*45CSR30 - Requirements for Operating Permits*

In accordance with 45CSR30 Major Source Determination, the emergency generators will be a non-major source which is subject to NSPS Subpart IIII. The facility's potential to emit for any regulated air pollutant will be far less than the 45CSR30 threshold of 100 TPY. Therefore, the facility will be subject to 45CSR30 and classified as a Title V deferred non-major source.

## AIR QUALITY IMPACT ANALYSIS

This writer deemed that an air dispersion modeling study or analysis was not necessary, because the proposed emission increase does not meet the definition as a “major source” per 45CSR§14-2.43.b.

## MONITORING OF OPERATIONS

CSX proposes to monitor the fuel usage and hours of operation of the engines. The writer believes that monitoring these parameters is more that sufficient for this type of emission unit. According to §60.4209(a) the non-resettable hour meter requirement of Subpart IIII applies.

Fact Sheet R13-2889  
CSX Transportation, Inc.  
Division Office Building, Huntington

## RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that CSX's proposed emergency generators meet all the requirements of the applicable rules when operated in accordance with the permit application. Therefore, this writer recommends granting CSX a Rule 13 Construction Permit for their proposed emergency generators.

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Roy F. Kees, P.E.  
Engineer - NSR Permitting

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DATE